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Attorney for defendant  
Carlos Lee Sanchez, Jr.

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

RICKY LEE WARE,  
KIMBERLY ANN WALLACE and  
CARLOS LEE SANCHEZ, JR.,  
  
Defendants.

CASE NO. 2:24-CR-281-DAD

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: April 28, 2025  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on April 28, 2025.

2. By this stipulation, defendants now move to continue the status conference until June 23, 2025, and to exclude time between April 28, 2025, and June 23, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has produced discovery in this matter, to date, consisting of over 52,000 pages of investigative reports, photographs and video surveillance evidence and 3000 native files. The government has further indicated, on or about April 16, 2025, they will begin producing (electronic) copies and/or extraction reports related to the eight seized electronic

1 devices (adding a significant volume of discovery to the already substantial amount of discovery  
2 previously produced by the government).

3 b) Counsel for defendants have met with their clients to discuss their respective  
4 cases. Defense counsel desire additional time to conduct investigation into the charges, the  
5 alleged roles of their respective clients, and to review discovery in this case. Defense counsel  
6 will need additional time to discuss potential resolutions with their clients, prepare pretrial  
7 motions, and otherwise prepare for trial.

8 c) Counsel for defendants believe that failure to grant the above-requested  
9 continuance would deny them the reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of April 28, 2025 to June 23, 2025,  
17 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
18 because it results from a continuance granted by the Court at defendant's request on the basis of  
19 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
20 of the public and the defendant in a speedy trial.

21 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
23 must commence.

24 IT IS SO STIPULATED.

25  
26 Dated: April 17, 2025

27 /s/ LINDA PARISI  
28 LINDA PARISI  
Counsel for Defendant  
RICKY LEE WARE

1 Dated: April 17, 2025

/s/ CANDICE L. FIELDS  
CANDICE L. FIELDS  
Counsel for Defendant  
KIMBERLY ANN WALLACE

4 Dated: April 17, 2025

/s/ JOHN R. MANNING  
JOHN R. MANNING  
Counsel for Defendant  
CARLOS LEE SANCHEZ, Jr

8 Dated: April 17, 2025

MICHELE BECKWITH  
Acting United States Attorney

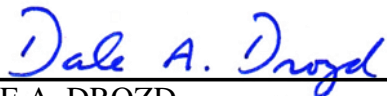
/s/ NICHOLAS M. FOGG  
NICHOLAS M. FOGG  
Assistant United States Attorney

12 **ORDER**

14 Pursuant to the stipulation of the parties and good cause appearing, the status conference  
15 scheduled for April 28, 2025, is continued to June 23, 2025, at 9:30 a.m. and time is excluded between  
16 April 28, 2025, and June 23, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

17 IT IS SO ORDERED.

18 Dated: April 18, 2025

  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE